

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
(Milwaukee Division)**

JOHN DOE,

Plaintiff,

v.

Civil Action No. 19-cv-388

MARIAN UNIVERSITY,

Defendant.

PARTIES FED. RULE CIV. PRO. 26(f) JOINT REPORT

Plaintiff John Doe by his attorneys, Jesse R. Binnall and Lindsay R. McKasson, and defendant Marian University by Lori M. Lubinsky and Danielle E. Baudhuin submit the following Rule 26(f) joint report.

SCHEDULING CONFERENCE

A telephonic scheduling conference under Fed. Rule Civ. Pro. 16(b) will be held on April 11, 2019 at 9:30 AM. The Court will initiate the call.

DISCOVERY PLAN

The parties jointly propose to the court the following discovery plan:

1. The parties agree that initial disclosures required by Fed. Rule Civ. Pro. 26(a)(1) will be due on or before May 15, 2019.
2. The parties will serve by email all discovery requests and written responses, and any other papers that are not filed with the Court. If transmission by email of voluminous materials is impractical, then those

materials shall be served by secure file transfer protocol, overnight delivery, hand-delivery, or courier. Service by email shall be the equivalent of service by hand-delivery for the purposes of Fed. R. Civ. P. 5 and 6, provided that the document is served prior to 5:00 p.m.

3. The parties shall submit a stipulated Protective Order, or if they fail to agree, shall file any motions for entry of such orders for this Court's consideration by June 1, 2019. The parties agree that until this Court enters a Protective Order, all documents and written discovery responses produced pursuant to this Plan, if any, shall be treated by the receiving party as Confidential and shall not be disclosed to any third persons.

4. Amendments to pleadings are due on or before May 31, 2019. After that date, the parties must request leave from Court or receive the other party's stipulation to file amended pleadings.

5. Reports from retained experts under Fed. Rule Civ. Pro. (26(a)(2) are due from the plaintiff on or before September 16, 2019, and from the defendant on or before December 16, 2019. Any rebuttal expert report for the plaintiff shall be due on January 17, 2020.

6. There shall be a limit of forty (40) interrogatories that can be posed by either party. By agreement of the parties or with leave of court, the number of interrogatories can be extended.

7. Discovery, other than expert discovery, is to be completed by November 1, 2019.

8. Defendant anticipates filing a dispositive motion. Dispositive motions should be filed by November 15, 2019.
9. The parties estimate that a trial of this matter would take 5-7 trial days.
10. Pretrial Disclosures will be made in accordance with Fed. Rule Civ. Pro. 26(a)(3).

Dated: April 8, 2019

Respectfully submitted,

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